IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant(s):   Khachatur Papanyan, Ken Maranian, Hang H. Ng

Assignee: Dell Products L.P.

Title: Method and Apparatus for Web Cache Using Database Triggers

Serial No.:	10/601,353	Filed:	June 23, 2003
Examiner:	Dangelino N. Gortayo	Group Art Unit:	2168
Docket No.:	DC-05118	Customer No.:	33438

Austin, Texas
March 21, 2007

COMMISSIONER FOR PATENTS
PO BOX 1450
ALEXANDRIA, VA 22313-1450

PRE-APPEAL REQUEST FOR REVIEW
AND STATEMENT OF REASONS

Sir:

Applicant requests review of the Final Rejection in the above-identified application. No amendments are being filed with the request. This request is being filed with a Notice of Appeal and a Petition for Extension of Time. The following sets forth a succinct, concise, and focused set of arguments for which the review is being requested.

CLAIM STATUS

Claims 1, 4-6, 8, 12-15, and 19-21 are pending in the application. Claims 1, 4-6, 8, 12-15, and 19-21 are rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,990,526 to Zhu (hereinafter "Zhu").

Independent claims 1, 8 and 15 were previously amended to recite that Applicants' invention comprises a database server that detects the execution of database triggers and, in response to detection of execution of a database trigger, is operable to set a flag to a value indicating that the version of the web page stored on a web server is not the most current version of the requested web page.

In the final office action, Examiner states that the Zhu reference discloses a database server that is operable to detect the execution of a database trigger. In support of this

proposition, Examiner cites Figure 4 and the coherency management module discussed in Zhu in column 6, lines 33-67. Examiner asserts that the cited portion of Zhu discloses a "decision process to monitor activity, detecting when activity decisions are met and an update interval is indicated." Applicants assume, based on the statement in the office action, that Examiner equates the processing steps described in the cited portion of Zhu to anticipate the database triggers recited in independent claims 1, 8 and 15 of Applicants' patent application. Applicants respectfully submit that the cited portion of Zhu fails to anticipate the database trigger limitation recited in independent claims 1, 8 and 15 of Applicants' patent application.

The cited portion of Zhu relates to the use of web page "signatures" to determine whether a web page needs to be updated. The coherency management module caches the signatures and the corresponding URL and uses the signatures to determine when a page has been updated. The signature is computed using cryptographic techniques and, in particular, a hash function for which the input is the corresponding web page for which a signature is to be generated.

The techniques disclosed in the cited portions of Zhu do not anticipate the database triggers recited in independent claims 1, 8 and 15 of Applicants' patent application. The use of database triggers for updating and caching web pages, based on the well-understood meaning of "database triggers," is not disclosed in the portions of Zhu cited by Examiner, nor elsewhere in the Zhu reference.

In the Advisory Action issued on March 1, 2007, Examiner continues to equate the updating mechanism of Zhu to the database trigger limitation recited in independent claims 1, 8 and 15, even though Zhu does not teach the use of a database trigger. In the Advisory Action, Examiner notes that Figure 1 shows both stored procedures and triggers. This is not inconsistent with the well-understood definition of "database trigger" as understood by those of skill in the art. As stated in the Response to Final Office Action filed on February 21, 2007, a database trigger is a "stored procedure" that is invoked automatically when a predefined event occurs. Furthermore, a "stored procedure" is a set of SQL commands that has been compiled and stored on the database server. These terms are well understood in the art. See, for example, the definitions of a database trigger and a "stored procedure" provided on the Tech-Faq web page at http://www.tech-faq.com/database-trigger.shtml and http://www.tech-faq.com/stored-procedure.shtml. Once the stored procedure has been

"stored," client applications can execute the stored procedure over and over again without sending it to the database server again and without compiling it again.

In the Advisory Action, Examiner states that the claims do not specifically recite "stored procedures" nor "SQL commands" and that "the specification cannot be read into the claims when examining claims." As discussed above, those of skill in the art would understand database trigger to include those terms. Applicants submit, therefore, that it is not necessary to "read the specification into the claims" for examination.

For the reasons set forth above, it is respectfully submitted that Zhu does not anticipate Applicants' invention as recited in independent claims 1, 8, and 15, and, therefore the rejection of those claims under 35 U.S.C. §102(e) should be removed. Furthermore, it is respectfully submitted that dependent claims 4-6, 12-14, and 19-21 are allowable as being dependent on an allowable base claim.

CONCLUSION

Applicant respectfully submits that all pending claims are in condition for allowance. Accordingly, Applicant requests that a Notice of Allowance be issued. Should any issues remain that might be subject to resolution through a telephone interview, the Examiner is requested to telephone the undersigned at 512-338-9100.

ELECTRONICALLY FILED
March 21, 2007

Respectfully submitted,

/Gary W. Hamilton/

Gary W. Hamilton
Attorney for Applicant(s)
Reg. No. 31,834